

# **Exhibit C**

**From:** [Luetkemeyer, Lucinda](#)  
**To:** ["Teske, Erin"](#)  
**Cc:** [Harmon, Mark](#); [Greim, Edward D.](#); [Donnelly, Jennifer](#)  
**Subject:** RE: Eastern/Strategic: Subpoena to GoDaddy  
**Date:** Friday, December 20, 2019 4:57:00 PM  
**Attachments:** [image001.png](#)  
  [image002.png](#)  
  [image003.png](#)

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Erin,

Your email to GoDaddy misrepresented the facts. There is no motion to quash on these GoDaddy subpoenas. Likewise, there has been no order from Judge Freeman related to the GoDaddy subpoenas. The only motions you have filed with the Court related to third party discovery were your letter motions of November 4 and 8 related to *different* subpoenas to Google, AT&T, and T-Mobile. Moreover, the GoDaddy subpoenas seek information related to *eight* web domains, only one of which we believe may belong to a client represented by you (GoldenSpringGroup.com). Judge Freeman never issued an order—or made a ruling, for that matter—directing that all outstanding discovery ‘be held in abeyance.’ Her limited ruling regarding third party discovery related to our dispute about Google, ATT, and T-Mobile.

Your attempt to interfere in lawful third-party discovery without filing a motion to quash or specifying who you represent is inappropriate, as you never sought, much less received, any relief from Judge Freeman related to the GoDaddy subpoenas. If we are mistaken and you previously raised the issue of these two GoDaddy subpoenas with Judge Freeman and received an order from her related to them, please let us know. Otherwise, we expect GoDaddy to comply with the subpoena and produce responsive information pursuant to Rule 45.

Thank you,

Lucinda

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**From:** Teske, Erin <ETeske@hodgsonruss.com>  
**Sent:** Friday, December 20, 2019 9:47 AM  
**To:** Greim, Edward D. <EDGreim@gravesgarrett.com>  
**Cc:** Harmon, Mark <MHarmon@hodgsonruss.com>  
**Subject:** Eastern/Strategic: Subpoena to GoDaddy

Eddie,

I understand that GoDaddy intends to produce documents in response to a subpoena you served upon it. We object to the production by GoDaddy of any documents, and any such production would violate Judge Freeman’s directive that the subpoenas are to be held in abeyance until further notice from the Court. By this email, I request that you advise GoDaddy that it is to withhold production pending a resolution by the Court.

**Erin N. Teske**  
Hodgson Russ LLP

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